

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Inventor: James J. Crow
Assignee: Motive, Inc.
Title: SYSTEM OF AUTOMATED CONFIGURATION OF NETWORK
SUBSCRIBERS FOR BROADBAND COMMUNICATION
Application No.: 09/653,486 Filing Date: August 31, 2000
Examiner: Uzma Alam Group Art Unit: 2157
Docket No.: MTV0017US Confirmation No.: 4808

Austin, Texas
May 14, 2007

Mail Stop: Appeal Brief - Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

REPLY BRIEF

Dear Sir:

This reply brief is submitted in response to the Examiner's Answer dated March 14, 2007. Since an appeal fee has been paid, Appellants do not believe any further fees are required to be paid with this reply. If wrong however, please charge deposit account No. 502306 for any additional sums which may be required as part of this reply.

Appellant acknowledges receipt of the Examiner's Answer dated March 14, 2007. Appellant argued in his Appeal Brief that the sections of Wang cited against independent claims 1 and 11 fail to teach the limitation of "automatically configuring an asset of said broadband communication network to communicate with said personal computer, wherein said automatically configuring said asset is performed by an automation server of said broadband communication network."

The Answer equates server 130 shown in Figure 2 of Wang with Claim 1's automation server. *See Answer, page 10, second paragraph.* The Answer also equates equipment 60 shown in Figure 2 of Wang with Claim 1's asset. The Answer asserts on page 10, second paragraph that Wang teaches that equipment 60 of Wang are automatically configured by the server 130 of Wang, and as such anticipates "automatically configuring an asset of said broadband communication network to communicate with said personal computer, wherein said automatically configuring said asset is performed by an automation server of said broadband communication network." However, this assertion is in direct contradiction to Figure 2 of Wang which shows that an engineer 50, not server 130, configures equipment 60. *See Wang, 1: 39-41 and Figure 2.* As such, Appellant asserts that independent Claims 1 and 11 are patentably distinguishable over the cited sections of Wang.

CONCLUSION

For the above reasons, Appellant respectfully submits that the rejection of all pending claims is unfounded. Accordingly, Appellant respectfully requests that the Board reverse the rejections of these claims.

Respectfully submitted,



Eric A. Stephenson
Attorney for Applicants
Reg. No. 38,321
Telephone: (512) 439-5093
Facsimile: (512) 439-5099